

EXHIBIT B

CERTIFICATION OF PROPOSED LEAD PLAINTIFF

I, Gregory Ingallina, certify that:

1. I have reviewed the facts and allegations of the complaint filed in this action.
2. I did not acquire the securities that are the subject of this action at the direction of plaintiff's counsel or in order to participate in this private action or any other litigation under the federal securities laws.
3. I am willing to serve as a Lead Plaintiff either individually or as part of a group. I understand that a Lead Plaintiff is a representative party who acts on behalf of other class members in directing the action, and whose duties may include providing testimony at deposition and trial, if necessary.
4. I represent and warrant that I am authorized to execute this Certification on behalf of the purchaser of the securities described herein (including, as the case may be, myself, my immediate family, any co-owners, any corporations or other entities, and/or any beneficial owners).
5. I will not accept any payments for serving as a representative party on behalf of the class beyond the purchaser's pro rata share of any recovery, except such reasonable costs and expenses (including lost wages) directly relating to the representation of the class as ordered or approved by the court.
6. I understand that this is not a claim form and that my ability to share in any recovery as a member of the class is unaffected by my decision to serve as a representative party or Lead Plaintiff.
7. I have listed all of my relevant transactions involving Gemini Interest Accounts ("GIAs") and/or the Gemini Earn program that are the subject of this action in the attached schedule.
8. During the three years prior to the date of this Certification, I have not sought to serve and I have not served as a representative party for a class in an action filed under the federal securities laws except (if any):

I declare under penalty of perjury, under the laws of the United States, that the information herein is accurate.

DocuSigned by:


C6CB5951630A45E
Gregory Ingallina

02/24/23 | 3:03 PM PST

Date

Gemini Trust Company, LLC (Gemini Earn)

Greg Ingallina

List of Deposits and Redemptions

Date	Transaction Type	Asset	Quantity
2022-03-02	Deposit	GUSD	50,050.00
2022-03-31	Monthly Interest Summary	GUSD	298.03
2022-04-30	Monthly Interest Summary	GUSD	276.75
2022-05-31	Monthly Interest Summary	GUSD	287.57
2022-06-30	Monthly Interest Summary	GUSD	279.85
2022-07-31	Monthly Interest Summary	GUSD	295.54
2022-08-31	Monthly Interest Summary	GUSD	303.03
2022-09-26	Redeem	GUSD	(2,036.44)
2022-09-30	Monthly Interest Summary	GUSD	293.02
2022-10-27	Deposit	GUSD	185,000.00
2022-10-31	Monthly Interest Summary	GUSD	338.83
2022-11-14	Redeem	GUSD	(2,000.00)
2022-11-16	Monthly Interest Summary	GUSD	532.36
2022-11-17	Redeem	GUSD	(233,918.53)

CERTIFICATION OF PROPOSED LEAD PLAINTIFF

I, Bartholomew Ingallina, certify that:

1. I have reviewed the facts and allegations of the complaint filed in this action.
2. I did not acquire the securities that are the subject of this action at the direction of plaintiff's counsel or in order to participate in this private action or any other litigation under the federal securities laws.
3. I am willing to serve as a Lead Plaintiff either individually or as part of a group. I understand that a Lead Plaintiff is a representative party who acts on behalf of other class members in directing the action, and whose duties may include providing testimony at deposition and trial, if necessary.
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8. During the three years prior to the date of this Certification, I have not sought to serve and I have not served as a representative party for a class in an action filed under the federal securities laws except (if any):

I declare under penalty of perjury, under the laws of the United States, that the information herein is accurate.

DocuSigned by:

Bartholomew Ingallina

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Bartholomew Ingallina

02/24/23 | 9:09 PM PST

Date

Gemini Trust Company, LLC (Gemini Earn)

Bart Ingallina

List of Deposits and Redemptions

Date	Transaction Type	Asset	Quantity
2022-01-25	Deposit	GUSD	1,000.00
2022-01-25	Redeem	GUSD	(1,000.00)
2022-01-25	Deposit	GUSD	25,000.00
2022-01-25	Deposit	BTC	4.71
2022-01-26	Deposit	GUSD	25,000.00
2022-01-26	Redeem	BTC	(4.71)
2022-01-27	Deposit	GUSD	25,000.00
2022-01-28	Deposit	GUSD	20,000.00
2022-01-31	Monthly Interest Summary	GUSD	92.28
2022-02-01	Deposit	GUSD	120,000.75
2022-02-05	Redeem	GUSD	(249.00)
2022-02-06	Redeem	GUSD	(46.00)
2022-02-07	Redeem	GUSD	(46.00)
2022-02-09	Redeem	GUSD	(91.00)
2022-02-11	Redeem	GUSD	(91.00)
2022-02-14	Redeem	GUSD	(137.00)
2022-02-15	Redeem	GUSD	(46.00)
2022-02-17	Redeem	GUSD	(91.00)
2022-02-19	Redeem	GUSD	(45.00)
2022-02-21	Redeem	GUSD	(92.00)
2022-02-21	Redeem	GUSD	(45.00)
2022-02-22	Redeem	GUSD	(46.00)
2022-02-23	Redeem	GUSD	(45.00)
2022-02-25	Redeem	GUSD	(46.00)
2022-02-25	Redeem	GUSD	(46.00)
2022-02-26	Redeem	GUSD	(45.00)
2022-02-28	Redeem	GUSD	(91.00)
2022-02-28	Monthly Interest Summary	GUSD	1,251.38
2022-03-01	Redeem	GUSD	(46.00)
2022-03-07	Redeem	GUSD	(274.00)
2022-03-09	Redeem	GUSD	(45.00)
2022-03-10	Redeem	GUSD	(46.00)
2022-03-11	Redeem	GUSD	(45.00)
2022-03-15	Redeem	GUSD	(228.00)
2022-03-15	Redeem	GUSD	(70,000.00)
2022-03-17	Redeem	GUSD	(62.00)
2022-03-18	Redeem	GUSD	(31.00)
2022-03-21	Redeem	GUSD	(61.00)
2022-03-22	Redeem	GUSD	(62.00)
2022-03-25	Redeem	GUSD	(61.00)
2022-03-26	Redeem	GUSD	(31.00)
2022-03-27	Redeem	GUSD	(62.00)

2022-03-28	Redeem	GUSD	(5,000.00)
2022-03-29	Redeem	GUSD	(5,000.00)
2022-03-31	Redeem	GUSD	(118.00)
2022-03-31	Monthly Interest Summary	GUSD	1,155.02
2022-04-05	Redeem	GUSD	(128.00)
2022-04-10	Redeem	GUSD	(98.00)
2022-04-11	Redeem	GUSD	(25.00)
2022-04-19	Redeem	GUSD	(198.00)
2022-04-24	Redeem	GUSD	(148.00)
2022-04-26	Redeem	GUSD	(24.00)
2022-04-29	Redeem	GUSD	(74.00)
2022-04-30	Monthly Interest Summary	GUSD	740.47
2022-05-01	Redeem	GUSD	(50.00)
2022-05-02	Redeem	GUSD	(49.00)
2022-05-03	Redeem	GUSD	(25.00)
2022-05-04	Redeem	GUSD	(5,000.00)
2022-05-04	Redeem	GUSD	(10,000.00)
2022-05-05	Redeem	GUSD	(48.00)
2022-05-09	Redeem	GUSD	(2,000.00)
2022-05-11	Redeem	GUSD	(2,131.00)
2022-05-13	Redeem	GUSD	(22.00)
2022-05-13	Redeem	GUSD	(21.00)
2022-05-16	Redeem	GUSD	(63.00)
2022-05-17	Redeem	GUSD	(22.00)
2022-05-20	Redeem	GUSD	(63.00)
2022-05-23	Redeem	GUSD	(43.00)
2022-05-25	Redeem	GUSD	(42.00)
2022-05-27	Redeem	GUSD	(64.00)
2022-05-30	Redeem	GUSD	(42.00)
2022-05-31	Monthly Interest Summary	GUSD	674.30
2022-06-06	Redeem	GUSD	(149.00)
2022-06-08	Redeem	GUSD	(500.00)
2022-06-10	Redeem	GUSD	(105.00)
2022-06-13	Redeem	GUSD	(64.00)
2022-06-14	Redeem	GUSD	(1,000.00)
2022-06-14	Redeem	GUSD	(1,000.00)
2022-06-15	Redeem	GUSD	(1,000.00)
2022-06-15	Redeem	GUSD	(1,000.00)
2022-06-16	Redeem	GUSD	(2,000.00)
2022-06-17	Redeem	GUSD	(1,000.00)
2022-06-18	Redeem	GUSD	(1,000.00)
2022-06-21	Redeem	GUSD	(2,641.00)
2022-06-22	Redeem	GUSD	(2,000.00)
2022-06-23	Redeem	GUSD	(3,039.00)
2022-06-23	Redeem	GUSD	(3,000.00)
2022-06-30	Monthly Interest Summary	GUSD	595.11
2022-07-03	Redeem	GUSD	(3,000.00)

2022-07-13	Redeem	GUSD	(369.00)
2022-07-14	Redeem	GUSD	(3,000.00)
2022-07-18	Redeem	GUSD	(83.00)
2022-07-20	Redeem	GUSD	(35.00)
2022-07-20	Deposit	BTC	1.00
2022-07-22	Deposit	BTC	1.00
2022-07-25	Deposit	BTC	1.00
2022-07-29	Redeem	GUSD	(2,222.00)
2022-07-29	Deposit	BTC	1.40
2022-07-30	Redeem	GUSD	(10,000.00)
2022-07-31	Monthly Interest Summary	GUSD	529.77
2022-07-31	Monthly Interest Summary	BTC	0.00
2022-08-04	Deposit	GUSD	18,834.00
2022-08-04	Deposit	BTC	0.76
2022-08-16	Redeem	GUSD	(9,000.00)
2022-08-17	Redeem	GUSD	(9,000.00)
2022-08-18	Redeem	GUSD	(600.00)
2022-08-31	Monthly Interest Summary	GUSD	506.98
2022-08-31	Monthly Interest Summary	BTC	0.01
2022-08-31	Redeem	GUSD	(707.97)
2022-09-14	Redeem	GUSD	(209.78)
2022-09-29	Redeem	GUSD	(224.00)
2022-09-29	Deposit	MATIC	547.62
2022-09-30	Monthly Interest Summary	MATIC	0.08
2022-09-30	Monthly Interest Summary	GUSD	449.24
2022-09-30	Monthly Interest Summary	BTC	0.01
2022-10-31	Monthly Interest Summary	MATIC	2.35
2022-10-31	Monthly Interest Summary	GUSD	396.96
2022-10-31	Monthly Interest Summary	BTC	0.01
2022-11-01	Redeem	GUSD	(427.51)
2022-11-03	Deposit	GUSD	1,200.00
2022-11-16	Monthly Interest Summary	GUSD	180.94
2022-11-16	Monthly Interest Summary	BTC	0.01
2022-11-17	Redeem	GUSD	(80,380.94)
2022-11-17	Redeem	BTC	(5.20)
2022-11-19	Redeem	MATIC	(551.12)
2022-11-30	Monthly Interest Summary	MATIC	1.08
2022-12-31	Monthly Interest Summary	MATIC	0.00
2023-01-09	Monthly Interest Summary	MATIC	0.00
2023-01-10	Redeem	MATIC	(0.00)

CERTIFICATION OF PROPOSED LEAD PLAINTIFF

I, Tze Ling Ng, certify that:

1. I have reviewed the facts and allegations of the complaint filed in this action.
2. I did not acquire the securities that are the subject of this action at the direction of plaintiff's counsel or in order to participate in this private action or any other litigation under the federal securities laws.
3. I am willing to serve as a Lead Plaintiff either individually or as part of a group. I understand that a Lead Plaintiff is a representative party who acts on behalf of other class members in directing the action, and whose duties may include providing testimony at deposition and trial, if necessary.
4. I represent and warrant that I am authorized to execute this Certification on behalf of the purchaser of the securities described herein (including, as the case may be, myself, my immediate family, any co-owners, any corporations or other entities, and/or any beneficial owners).
5. I will not accept any payments for serving as a representative party on behalf of the class beyond the purchaser's pro rata share of any recovery, except such reasonable costs and expenses (including lost wages) directly relating to the representation of the class as ordered or approved by the court.
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7. I have listed all of my relevant transactions involving Gemini Interest Accounts ("GIAs") and/or the Gemini Earn program that are the subject of this action in the attached schedule.
8. During the three years prior to the date of this Certification, I have not sought to serve and I have not served as a representative party for a class in an action filed under the federal securities laws except (if any):

I declare under penalty of perjury, under the laws of the United States, that the information herein is accurate.

Executed this 22 day of Feb, 2023



Tze Ling Ng

Gemini Trust Company, LLC (Gemini Earn)

Tze Ling Ng

List of Deposits and Redemptions

Date	Transaction Type	Asset	Quantity
2021-12-11	Deposit	GUSD	10,000.0000
2021-12-11	Deposit	GUSD	60,000.0000
2021-12-31	Monthly Interest Summary	GUSD	267.6712
2022-01-31	Monthly Interest Summary	GUSD	463.3908
2022-02-16	Deposit	GUSD	20,000.0000
2022-02-16	Deposit	GUSD	5,112.2900
2022-02-17	Deposit	GUSD	19,677.0000
2022-02-18	Deposit	GUSD	6,701.2600
2022-02-28	Monthly Interest Summary	GUSD	545.3206
2022-03-01	Deposit	GUSD	11,000.0000
2022-03-10	Deposit	ETH	6.0000
2022-03-31	Monthly Interest Summary	ETH	0.0043
2022-03-31	Monthly Interest Summary	GUSD	879.7988
2022-04-30	Monthly Interest Summary	ETH	0.0062
2022-04-30	Monthly Interest Summary	GUSD	740.1184
2022-05-31	Monthly Interest Summary	ETH	0.0064
2022-05-31	Monthly Interest Summary	GUSD	769.0632
2022-06-20	Redeem	GUSD	(36,629.0000)
2022-06-30	Monthly Interest Summary	ETH	0.0062
2022-06-30	Monthly Interest Summary	GUSD	681.4232
2022-07-06	Deposit	GUSD	37,000.0000
2022-07-31	Monthly Interest Summary	ETH	0.0104
2022-07-31	Monthly Interest Summary	GUSD	751.3345
2022-08-31	Monthly Interest Summary	ETH	0.0153
2022-08-31	Monthly Interest Summary	GUSD	811.9566
2022-09-30	Monthly Interest Summary	ETH	0.0149
2022-09-30	Monthly Interest Summary	GUSD	790.3141
2022-10-31	Monthly Interest Summary	ETH	0.0132
2022-10-31	Monthly Interest Summary	GUSD	700.9988
2022-11-15	Monthly Interest Summary	ETH	0.0056
2022-11-16	Redeem	ETH	(6.0825)
2022-11-19	Monthly Interest Summary	GUSD	317.5213
2022-11-20	Redeem	GUSD	(140,580.4600)

CERTIFICATION OF PROPOSED LEAD PLAINTIFF

I, Christine Hogan, certify that:

1. I have reviewed the facts and allegations of the complaint filed in this action.
2. I did not acquire the securities that are the subject of this action at the direction of plaintiff's counsel or in order to participate in this private action or any other litigation under the federal securities laws.
3. I am willing to serve as a Lead Plaintiff either individually or as part of a group. I understand that a Lead Plaintiff is a representative party who acts on behalf of other class members in directing the action, and whose duties may include providing testimony at deposition and trial, if necessary.
4. I represent and warrant that I am authorized to execute this Certification on behalf of the purchaser of the securities described herein (including, as the case may be, myself, my immediate family, any co-owners, any corporations or other entities, and/or any beneficial owners).
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I declare under penalty of perjury, under the laws of the United States, that the information herein is accurate.

Signed by:



0D758F1E21624FA...
Christine Hogan

02/23/23 | 5:30 PM PST

Date

Gemini Trust Company, LLC (Gemini Earn)

Christine Hogan

List of Deposits and Redemptions

Date	Transaction Type	Asset	Quantity
2021-11-09	Deposit	GUSD	5,000.0000
2021-11-30	Monthly Interest Summary	GUSD	22.3130
2021-12-26	Deposit	GRT	656.8428
2021-12-31	Monthly Interest Summary	GUSD	33.1204
2021-12-31	Monthly Interest Summary	GRT	0.4486
2022-01-31	Monthly Interest Summary	GUSD	33.3388
2022-01-31	Monthly Interest Summary	GRT	3.4868
2022-02-28	Monthly Interest Summary	GUSD	30.3014
2022-02-28	Monthly Interest Summary	GRT	1.5224
2022-03-31	Monthly Interest Summary	GUSD	33.7585
2022-03-31	Monthly Interest Summary	GRT	1.6896
2022-04-10	Redeem	GRT	(664.4815)
2022-04-30	Monthly Interest Summary	GUSD	28.3238
2022-04-30	Monthly Interest Summary	GRT	0.4913
2022-05-31	Monthly Interest Summary	GUSD	29.4315
2022-05-31	Monthly Interest Summary	GRT	0.0000
2022-06-30	Monthly Interest Summary	GUSD	28.6412
2022-06-30	Monthly Interest Summary	GRT	0.0000
2022-07-31	Monthly Interest Summary	GUSD	30.2463
2022-07-31	Monthly Interest Summary	GRT	0.0000
2022-08-31	Monthly Interest Summary	GUSD	31.0133
2022-08-31	Monthly Interest Summary	GRT	0.0000
2022-09-27	Deposit	GRT	664.4815
2022-09-27	Deposit	COMP	5.3989
2022-09-27	Deposit	MANA	506.0856
2022-09-27	Deposit	AAVE	2.9329
2022-09-27	Deposit	MATIC	738.9166
2022-09-27	Deposit	ETH	15.3315
2022-09-27	Deposit	BTC	4.0271
2022-09-27	Deposit	UNI	19.9742
2022-09-27	Deposit	AXS	19.9571
2022-09-30	Monthly Interest Summary	MATIC	0.3106
2022-09-30	Monthly Interest Summary	MANA	0.0312
2022-09-30	Monthly Interest Summary	AAVE	0.0002
2022-09-30	Monthly Interest Summary	GUSD	30.1866
2022-09-30	Monthly Interest Summary	COMP	0.0010
2022-09-30	Monthly Interest Summary	UNI	0.0016
2022-09-30	Monthly Interest Summary	ETH	0.0038
2022-09-30	Monthly Interest Summary	GRT	0.1349
2022-09-30	Monthly Interest Summary	BTC	0.0009
2022-09-30	Monthly Interest Summary	AXS	0.0108
2022-10-31	Monthly Interest Summary	MANA	0.3225

2022-10-31	Monthly Interest Summary	AAVE	0.0031
2022-10-31	Monthly Interest Summary	GUSD	26.7752
2022-10-31	Monthly Interest Summary	COMP	0.0103
2022-10-31	Monthly Interest Summary	UNI	0.0170
2022-10-31	Monthly Interest Summary	ETH	0.0334
2022-10-31	Monthly Interest Summary	GRT	1.3957
2022-10-31	Monthly Interest Summary	BTC	0.0093
2022-10-31	Monthly Interest Summary	AXS	0.1124
2022-10-31	Monthly Interest Summary	MATIC	3.0423
2022-11-17	Monthly Interest Summary	ETH	0.0142
2022-11-17	Monthly Interest Summary	BTC	0.0042
2022-11-17	Redeem	BTC	(4.0414)
2022-11-17	Redeem	ETH	(15.3830)
2022-11-30	Monthly Interest Summary	MATIC	2.6944
2022-11-30	Monthly Interest Summary	MANA	0.1582
2022-11-30	Monthly Interest Summary	AAVE	0.0015
2022-11-30	Monthly Interest Summary	GUSD	12.1441
2022-11-30	Monthly Interest Summary	COMP	0.0050
2022-11-30	Monthly Interest Summary	UNI	0.0083
2022-11-30	Monthly Interest Summary	GRT	0.6791
2022-11-30	Monthly Interest Summary	AXS	0.0547
2022-12-31	Monthly Interest Summary	MATIC	2.7011
2022-12-31	Monthly Interest Summary	MANA	0.0043
2022-12-31	Monthly Interest Summary	AAVE	0.0000
2022-12-31	Monthly Interest Summary	GUSD	0.0456
2022-12-31	Monthly Interest Summary	COMP	0.0000
2022-12-31	Monthly Interest Summary	UNI	0.0002
2022-12-31	Monthly Interest Summary	AXS	0.0002
2022-12-31	Monthly Interest Summary	GRT	0.0057
2023-01-09	Monthly Interest Summary	MANA	0.0012
2023-01-09	Monthly Interest Summary	AAVE	0.0000
2023-01-09	Monthly Interest Summary	GUSD	0.0132
2023-01-09	Monthly Interest Summary	COMP	0.0000
2023-01-09	Monthly Interest Summary	UNI	0.0000
2023-01-09	Monthly Interest Summary	AXS	0.0000
2023-01-09	Monthly Interest Summary	GRT	0.0016
2023-01-10	Redeem	AXS	(20.1352)
2023-01-10	Redeem	MANA	(506.6030)
2023-01-10	Redeem	AAVE	(2.9377)
2023-01-10	Redeem	GRT	(666.6985)
2023-01-10	Redeem	UNI	(20.0013)
2023-01-10	Redeem	COMP	(5.4153)
2023-01-10	Redeem	GUSD	(5,369.6500)
2023-01-31	Monthly Interest Summary	MATIC	2.5623